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24 UNITED STATES DISTRICT COURT

25 NORTHERN DISTRICT OF CALIFORNIA

26 OAKLAND DIVISION

27 UNITED STATES OF AMERICA, )

28 ) NO. 14-CR-00117 JST

Plaintiff, )

29 ) **STIPULATION AND ~~PROPOSED~~ ORDER**  
v. ) **TO EXCLUDE TIME UNDER THE SPEEDY**  
30 ) **TRIAL ACT**

31 JOEL MANUEL TAYLOR )

32 a/k/a Joel Fears, )

33 a/k/a Joe Taylor, )

34 Defendant. )

35 )

On November 13, 2015, the parties appeared before the Court for a status conference. At the status conference the Court ordered that time be excluded, for the reasons stated on the record, including for effective preparation of counsel pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv), between November 13, 2015 and December 8, 2015. With the agreement of the parties, the Court enters this order documenting the exclusion of time under the Speedy Trial Act, 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv), from November 13, 2015 to December 8, 2015.

The parties agreed and the Court ordered the exclusion of time under the Speedy Trial Act to allow counsel reasonable time necessary for effective preparation, taking into account the exercise of due diligence, particularly in light of the defendant' prolonged unavailability to meet with defense counsel. The Court finds that, pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv), the ends of justice served by excluding the above period of time outweighs the best interest of the public and the defendant in speedy trial.

DATED: November 18, 2015

Respectfully submitted,

**BRIAN J. STRETCH**  
Acting United States Attorney

/s/ Elizabeth Steinfeld  
ELIZABETH S. STEINFELD  
Attorney for Defendant

/s/ Thomas R. Green  
THOMAS R. GREEN  
Assistant United States Attorney

## [PROPOSED] ORDER

Based on the reasons provided in the stipulation of the parties above and the reasons stated on the record at the November 13, 2015 status conference, with the consent of both parties, the Court orders that the period from November 13, 2015 to December 8, 2015 be excluded from Speedy Trial Act calculations, pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv).

IT IS SO ORDERED.

DATED: November 19, 2015

HON. JON S. TIGAR  
United States District Court Judge